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May 27, 2025

**VIA ECF**

Hon. Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

In response to the Court's invitation to submit a proposed instruction striking Mr. Mescudi's opinion about whether Mr. Combs was telling the truth during the Soho House meeting, the defense requests that the Court instruct the jury as follows if the motion to strike is granted:

"You heard testimony from witness Scott Mescudi about a meeting with Mr. Combs at the Soho House, during which Mr. Mescudi said he asked about his car. He further shared his opinion of whether Mr. Combs was being truthful during that conversation. That testimony regarding Mr. Mescudi's opinion has been stricken from the record. Accordingly, you are to disregard and put out of your mind completely Mr. Mescudi's testimony regarding his opinion."

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

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